

Transmission Service Issues List

1. TBL requires customers to make requests for long-term service by sending a facsimile. The current manual process with non-standardized updating procedures is not transparent and subject to error. TBL should require all long-term firm transmission requests to be made on OASIS. As an interim or transitional step, TBL could handle existing requests using a manual process, however, all new requests should be made on OASIS.

In addition, TBL doesn't have a consistent method in place for managing its long-term queue. We believe that part of the problem is the lack of consistency in the naming of Points of Receipt and Delivery. By way of example, TBL's queue refers to the John Day Point of Delivery in 10 different ways. Similarly, there are multiple references to TBL's customers including Powerex, PBL, etc.

2. TBL's Short-Term Firm Transmission Reservation Process has numerous problems, including a problematic bumping process.

- **Manual Bumping Process:**
The current process restricts Transmission Customers to five requests per day and is inconsistent with TBL's published business practice. It is unclear why TBL is restricting the number of request to five per day: 1) if it is because it is a manual process, then create a workable automated process; 2) if it is to reduce traffic on a particular node, then place restrictions on the number of requests per path per day; and/or, 3) if it is because overall transaction volume is high then institute a business practice that customers cannot request when ATC for a path is 0 MW and arrange for ATC to be posted at fixed intervals.

The manual process has been problematic even though only a few requests have been submitted this fall. Powerex expects the manual process to be overwhelmed in the spring time when customers start to compete for STF for the summer months. This process must be automated and we suggest that TBL modify the automated process that it had in place up until January 2003.

The technical challenge appears to be how to automate the bumping process while still allowing for the Right of First Refusal. Powerex would like TBL to convene a technical discussion to identify the appropriate logic and software solutions so that this flexibility can work without compromising conditional reservations.

- **Processing Requests:**
Currently, TBL is processing requests by start date rather than in the order in which requests are received. FERC is clear that requests must be processed in the order that they were received and processing by start date is contrary to TBL's tariff.

In addition, we suggest that TBL could better handle reservation requests by implementing standard timelines. Currently, TBL holds requests in the queue until 30 days prior to the start of service, which effectively gives transmission customers a free option to wait around in the queue. Powerex believes that if there is no ATC available when the request gets processed (which should be when it the request is received) then it should be denied. We do not believe that TBL's current practice is consistent with the "best efforts" language that is in TBL's business practice.

- **TBL doesn't have a set time for posting ATC:**
TBL can and does post ATC at any time. Consequently, customers who are interested in transmission must continuously poll the TBL site to check on ATC and decide whether to submit requests. This combined with TBL's restriction of 200 hits/hour severely restricts a Transmission Customer's ability to compete for transmission. One solution would be to post ATC at set "competition times" each day up to once an hour (i.e., XX:45) and then open up for competition at YY:00.

- Short-Term Firm Redirects:
With the added flexibility allowed with Firm Redirect service, ATC can either be encumbered or unencumbered, i.e., undergoing an evaluation. Therefore, it is important develop a process that will accommodate both “types” of ATC. The above proposal which would require publishing ATC once an hour would account for this.

A Proposal to address Short-term Firm Transmission Reservation Problems

The times below for an ATC Posting, Requesting and Bumping Process is offered as a suggestion to address the issues addressed earlier. The details could be modified for the purpose of better matching any of BPA’s internal deadlines or scheduling requirements. This proposal is intended to fit within FERC rules and timelines.

ATC Posting, Requesting and Bumping Process

1. Final ATC is updated daily at 08:00.
 2. Requests for transmission and redirect requests are accepted at 09:00
 3. No limit on total number of requests; however, a limit on total requests/path/ offering of 50.
 4. Between 09:00 and 09:45, customers can modify the following bumping market parameters on their requests:
 - Acceptable Minimum Capacity.
 - Acceptable Minimum Duration.
 - Acceptable Maximum Duration.
 5. Bumping market is run at 10:00. Bumping market runs automatically, using customers’ parameters and awarding accordingly.
 6. Any firm ATC that becomes available as a result of a confirmed redirect request is posted for sale in a subsequent iteration steps 1-4, starting at 12:00, to be repeated until no bumping market is required. As it is unlikely customers will redirect off of a competitive path with limited ATC, more than one iteration of step 1-4 would rarely be required.
3. TBL’s OASIS is often inaccurate and this shouldn’t be the case.
We believe that this is the result of not posting long-term requests on OASIS and not adjusting ATC to reflect derating decisions. Also, TBL’s OTC ratings do not match with CISO and rather than resolving the conflict, each charge the other with having incorrect ratings.

Powerex [4 December 2003]